



February 23, 2024

Hon. Magistrate Parker
United State District Court, S.D.N.Y.
500 Pearl Street
Courtroom 17D
New York, NY 10007

RE: Delgado v. Donald J. Trump for President, et. al., 19-cv-11764 (AT) (KHP) – time-sensitive request for brief continuance of 30(b)(6) deposition

VIA: electronic submission through *pro-se* intake unit

Your Honor,

I am the *pro-se* Plaintiff in the above-mentioned matter, referred to herein as the “Plaintiff” or in first person. I write to inform your Honor that Defendants’ counsel and I are in agreement for a brief postponement of the 30(b)(6) deposition currently due to take place on Tuesday, February 27th.

I conferred with Defendants’ counsel earlier today on this topic, and he has no objection, and suggested I file this motion.

A few days ago, when searching the digital case file provided to me by prior counsel, by sheer happenstance I came upon a folder that contained what appears to be a production by the Transition Team (“TFA”). I was never made aware by the Derek Smith Law Group (the attorneys on the case at the apparent time of the production) of said production. Nor did either *subsequent* attorney inform me of said production. Moreover, it is not labeled as a “production” or similarly appropriate title in the digital case file. Concerned, I promptly reached out to the Derek Smith Law Group, with whom I conferred yesterday, and it appears that said production ‘fell through the cracks’, or at least informing me of such, given that the attorney on the case was in the course of transitioning out of the firm around the time this was received.

I promptly notified Defendants’ counsel yesterday afternoon, during our meet-and-confer call regarding the upcoming 30(b)(6) deposition, in an abundance of transparency.

I request a brief continuance of the 30(b)(6) deposition so as to permit time to review this production. It appears to be over 13,000 pages. I am also working on downloading the production to provide it to Defendants’ counsel so that they may review, as well.

Mr. Blumetti, as I stated earlier, has no objection to the continuance.

I respectfully request that Your Honor enter an order this afternoon (February 23, 2024), if at all possible given Your Honor's demanding schedule, so that I may cancel Tuesday's court reporter in time to avoid an unnecessary \$510 charge. Defendants' counsel and I can then confer as to a re-setting date, to be no later than March 21, 2024, if such meets Your Honor's approval.

Respectfully submitted,

s/Arlene Delgado
Arlene Delgado, Plaintiff, Pro-Se

Out of solicitude to the pro se Plaintiff, the 30(b)(6) deposition that is currently scheduled to occur on Tuesday, March 5, 2024 may be rescheduled, provided that the deposition is rescheduled to occur no later than **Friday, March 22, 2024**.

SO ORDERED:

Katharine H Parker
HON. KATHARINE H. PARKER
UNITED STATES MAGISTRATE JUDGE 2/23/2024